IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: GLUCAGON-LIKE PEPTIDE-1 RECEPTOR AGONISTS (GLP-1 RAS) PRODUCTS LIABILITY LITIGATION **CIVIL ACTION**

THIS DOCUMENT RELATES TO:

2:24-md-03094

MDL No. 3094

ALL ACTIONS/ALL CASES

HON. KAREN S. MARSTON

JOINT MOTION FOR THE ENTRY OF PROPOSED CASE MANAGEMENT ORDER

All Defendants and Plaintiffs (together, the "Parties"), respectfully, and by counsel, hereby jointly move for the entry of the attached Proposed Case Management Order governing the form, procedure, and schedule of the completion and service of Plaintiff Fact Sheets ("PFS") and the other documents referenced therein.

Dated: July 3, 2024 Respectfully submitted,

/s/ Loren H. Brown

Loren H. Brown (admitted pro hac vice)

Lucas P. Przymusinski (admitted pro hac vice)

DLA PIPER LLP (US)

1251 Avenue of the Americas

27th Floor

New York, NY 10020-1104

Telephone: (212) 335-4846

Facsimile: (212) 335-4501

loren.brown@us.dlapiper.com

lucas.przymusinski@us.dlapiper.com

Ilana H. Eisenstein (PA Bar No. 94907) Raymond M. Williams (PA Bar No. 90771)

DLA PIPER LLP (US)

1650 Market Street, Suite 5000

Philadelphia, PA 19103 Telephone: (215) 656-3300

Facsimile: (215) 606-3301 ilana.eisenstein@us.dlapiper.com raymond.williams@us.dlapiper.com

Matthew A. Holian (admitted *pro hac vice*) Katherine W. Insogna (admitted *pro hac vice*)

DLA PIPER LLP (US)

33 Arch Street, 26th Floor

Boston, MA 02110

Telephone: (617) 406-6000 Facsimile: (617) 406-6100 matt.holian@us.dlapiper.com katie.insogna@us.dlapiper.com

Attorneys for Defendants Novo Nordisk A/S, Novo Nordisk North America Operations A/S, Novo Nordisk US Holdings Inc., Novo Nordisk US Commercial Holdings Inc., Novo Nordisk Inc., Novo Nordisk Research Center Seattle, Inc., and Novo Nordisk Pharmaceutical Industries LP

Dated: July 3, 2024

/s/ Samuel W. Silver

Samuel W. Silver (PA Bar No. 56596) Catherine M. Recker (PA Bar No. 56813) Bruce P. Merenstein (PA Bar No. 82609) Abigail T. Burton (PA Bar No. 334450)

WELSH & RECKER, P.C.

306 Walnut Street
Philadelphia, PA 19106
(215) 972-6430
ssilver@welshrecker.com
cmrecker@welshrecker.com
bmerenstein@welshrecker.com
aburton@welshrecker.com

James F. Hurst, P.C. (admitted *pro hac vice*) Renee D. Smith (admitted *pro hac vice*) Diana M. Watral, P.C. (admitted *pro hac vice*) Mark Premo-Hopkins (admitted *pro hac vice*)

KIRKLAND & ELLIS

300 North LaSalle Chicago, IL 60654

Telephone: (312) 862-2000 Facsimile: (312) 862-2200 james.hurst@kirkland.com renee.smith@kirkland.com diana.watral@kirkland.com mark.premohopkins@kirkland.com

Jonathan M. Redgrave (admitted *pro hac vice*) Erica B. Zolner (admitted *pro hac vice*)

REDGRAVE LLP

4800 Westfields Blvd. | Suite 250 Chantilly, VA 20151 (703) 592-1155 jredgrave@redgravellp.com ezolner@redgravellp.com

Attorneys for Defendant Eli Lilly & Company

Dated: July 3, 2024

/s/ Parvin K. Aminolroaya

Parvin K. Aminolroaya

SEEGER WEISS LLP

55 Challenger Road, 6th Floor Ridgefield Park, NJ 07660 Telephone: (973) 639-9100 paminolroaya@seegerweiss.com

/s/ Jonathan Orent

Jonathan Orent

MOTLEY RICE LLC

40 Westminster Street, 5th Floor Providence, RI 02903 Telephone: (401) 457-7700 jorent@motleyrice.com

/s/ Sarah Ruane

WAGSTAFF & CARTMELL

4740 Grand Avenue, Suite 300 Kansas City, MO 64112 Telephone: (813) 701-1123 sruane@wcllp.com

/s/ Paul Pennock

Paul Pennock MORGAN & MORGAN 199 Water Street, Suite 1500 New York, NY 10038 Telephone: (212) 738-6299 ppennock@forthepeople.com

Co-Lead Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that, on July 3, 2024, a true and correct copy of the foregoing Motion for the Entry of Case Management Order was electronically filed using the Court's CM/ECF system, causing a notification of the filing to all counsel of record.

/s/Loren H. Brown
Loren H. Brown